

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESale PRICE)
LITIGATION)

MDL NO. 1456
Civil Action No. 01-12257-PBS

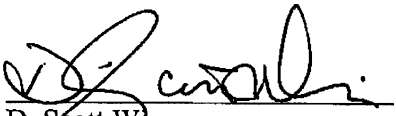
THIS DOCUMENT RELATES TO:

International Union of Operating)
Engineers, Local No. 68 Welfare)
Fund v. AstraZeneca PLC at al.)
Civil Action No. 04-11503-PBS)

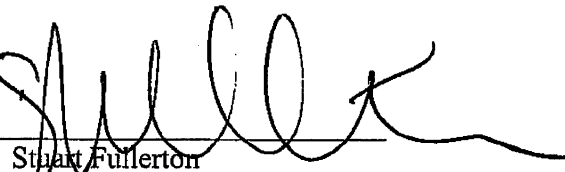
**DEFENDANTS ASTRAZENECA PHARMACEUTICALS LP
AND ASTRAZENECA LP'S LOCAL RULE 16.1(D)(3) CERTIFICATION**

Pursuant to Local Rule 16.1(D)(3), defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP, and its attorneys hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course—and various alternative courses—for the above-captioned litigation and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

By its attorneys:


D. Scott Wise
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, New York 10017
Tel: 212-450-4000
Fax: 212-450-3800

ASTRAZENECA PHARMACEUTICALS LP
ASTRAZENECA LP


Stuart Fullerton
Senior Litigation Counsel

CERTIFICATE OF SERVICE

I certify that on April 7, 2005, a true and correct copy of Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP's Local Rule 16.1(D)(3) Certification was served on all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to Verilaw Technologies for posting and notification to all parties.

/s/ Lucy Fowler
Lucy Fowler